

1 **SAO**
2 **RAMZY P. LADAH**
3 Nevada Bar No. 11405
4 **JOSEPH C. CHU**
5 Nevada Bar No. 11082
6 **LADAH LAW FIRM**
7 517 S. Third Street
8 Las Vegas, NV 89101
9 litigation@ladahlaw.com
10 T: 702.252.0055
11 F: 702.248.0055
12 *Attorneys for Plaintiffs*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 TDC SPECIALTY INSURANCE
16 COMPANY;

17 Plaintiff,

18 vs.

19 JAMMIE V. FOSTER, individually and as
20 personal representative of the Estate of Lori
21 Downing and as heir of decedent LORI
22 DOWNING,

23 Defendants.

CASE NO.: 2:24-cv-02017-APG-EJY

24 **STIPULATION AND ORDER TO**
25 **EXTEND TIME TO RESPOND TO**
26 **PLAINTIFF TDC SPECIALTY**
27 **INSURANCE COMPANY'S MOTION**
28 **FOR SUMMARY JUDGMENT**

Plaintiff, TDC SPECIALATY INSURANCE COMPANY ("Plaintiff"), and Defendant, JAMMIE V. FOSTER ("Defendant"), by and through their respective, undersigned counsel of record, hereby stipulate and agree that the deadline for Defendant to respond to Plaintiff's Motion for Summary Judgment (ECF No. 18) shall be extended April 8, 2025.

...

...

...

This brief extension of time is sought to accommodate the parties ongoing, meaningful settlement negotiations. The additional time, if granted, will allow the parties to continue to engage in good-faith settlement negotiations, without imposing significant delay on the balance of the litigation.

The parties respectfully submit this extension is not being sought for reasons of undue delay or any other untoward purpose, and further, that there exists good cause justifying relief requested.

IT IS HEREBY AGREED AND STIPULATED.

DATED this 24th day of March, 2023.

DATED this 24th day of March, 2023.

CLYDE & CO US LLP

LADAH LAW FIRM

/s/ Justin S. Hepworth, Esq.

/s/ Ramzy P. Ladah, Esq.

AMY M. SAMBERG

RAMZY P. LADAH

Nevada Bar No. 10212

Nevada Bar No. 11405

JUSTIN S. HEPWORTH

JOSEPH C. CHU

Nevada Bar No. 10080

Nevada Bar No. 11082

7251 W. Lake Mead Boulevard, Suite 430

517 S. Third Street

Las Vegas, NV 89128

Las Vegas, NV 89101

Attorneys for Plaintiff

Attorneys for Defendant

ORDER

Based upon the Stipulation of the parties, the Court having reviewed all pleadings and papers on file herein, and good cause appearing:

IT IS HEREBY ORDERED that the deadline for Defendant to file a response to Plaintiff's Motion for Summary Judgment (ECF No. 18) is extended to April 8, 2025.

IT IS SO ORDERED.

By


CHIEF UNITED STATES DISTRICT COURT JUDGE

DATED: March 25, 2025